

Pork Industry Identification Working Group's (PIIWG) Response to
USDA NAIS "Draft Program Standards" and "Strategic Plan" April 25, 2005

July 6, 2005

The following comments are being submitted on behalf of the Pork Industry Identification Working Group (PIIWG), which was formed under the direction of the USDA's National Identification Steering Committee to convert the swine portion of the USAIP into program standards for the pork industry. The following comments on USDA NAIS "Draft Program Standards" and "Strategic Plan" April 25, 2005 (docket 3 05-015-1) are based on the needs of the swine industry and may not apply to the needs of other species groups. The PIIWG applauds the flexibility of NAIS, which allows species-specific solutions to identification and trace-back.

- 1) Is a mandatory system necessary for successful animal disease surveillance, monitoring and response systems to support Federal animal health programs?

The PIIWG supports a mandatory system for all premises and all relevant species. The PIIWG supports a mandatory system only after the confidentiality of the data can be guaranteed.

- 2) At what point (shipping or receiving) should animals be identified and how should compliance be assured?

The PIIWG recommends that animals requiring approved identification devices be identified before shipment from the source premises. Groups or lots of animals requiring group/lot identification may not leave their source premises without documentation of 1) a valid PIN and/or 2) the group/lot identifier.

The PIIWG recognizes that fairs, markets and sale-barns may apply to become tagging sites. PIIWG submits that the term "tagging site" may be misleading since, due to human safety or animal welfare concerns, tags may not be the identification method of choice in some situations. Instead, animals may receive back-tags or tattoos, or other approved identification methods or devices. PIIWG submits that the term "official identification application sites" should replace "tagging sites".

Should animals arrive to the official identification application site without a PIN, the source farm must be recorded and the animals must be identified with an official method or device. The identification number of the animals will be linked to the PIN of the official identification application site. It may be necessary to ensure that, in order to operate, fairs, livestock markets and shows become official identification application sites.

Compliance should be audited and enforced by animal health officials either by personally visiting the official identification application sites, or via communication

with such operations. Animal health officials may also interact with law enforcement and Department of Transportation.

- 3) How should compliance with record keeping and reporting be achieved when there is a private sale or movement without going through a sale-barn or market?

Compliance with either recording or reporting requirements can be achieved via site visits on a statistically valid percentage of premises. State and federal animal health officials must have the flexibility to examine farm or market records in a targeted fashion, rather than in a random fashion. Farm and market records in the swine industry may be best examined on the state or local level.

- 4) Who should be responsible for recording/reporting a private sale or movement?

The PIIWG supports the maintenance of animal movement records and the reporting of only interstate movements. PIIWG recommends that both seller/shipper and buyer/receiver maintain records of the transaction. In the case that on-farm records are lost from one farm, the other farm will have a record of the transaction/shipment.

If reporting of intrastate movement becomes mandatory, the buyer/receiver should report the movement/transaction.

- 5) How can reporting of movements and events be inputted into NAIS in the least costly, most efficient manner?

For certificates of veterinary inspection and for interstate movement reports, electronic methods will be the most efficient. However, not every animal owner or accredited veterinarian will have access to or comfort with the internet, so a system by which submission of records via fax, phone or mail should also be made available.

- 6) Should an age limit be placed on animals before they are identified?

Identification of animals should be movement specific, rather than age-specific. For some trace-back purposes, the birth farm may be important to know, especially for diseases that are vertically transmitted or have long incubation periods. However, if an animal never leaves its birth farm, it would not require identification. As a general rule, once any animal leaves its birth farm, it should be identified, either via group/lot identification or individual identification, regardless of age. Records must be maintained of its destination for trace-back. The success of a trace-back depends on record keeping and not the age at which the animal is identified.

- 7) Timeline too aggressive or not aggressive enough?

Assuming that confidentiality concerns are resolved, the PIIWG supports an aggressive timeline in order to protect the national herd from the devastation of a disease crisis. The PIIWG would like to see all premises registered by 2007 and a

mandatory animal identification system by 2008. The PIIWG is concerned that the budget as projected is not large enough to meet the USDA projected timeline and is concerned that the NAIS program implementation will be hampered unless an aggressive and accurate budget is created by USDA.

8) Should there be different time lines for the different species?

The PIIWG recommends that all species should have mandatory implementation at the same time, starting from the point at which all species-specific program standards are finalized.

9) What are the most cost effective and efficient ways for submitting data?

The PIIWG supports the use of electronic methods, provided that they meet high levels of security standards. Phone, fax or mail may be required as alternatives.

10) What information collected by NAIS are confidentiality concerns?

The PIIWG is concerned that parties unfriendly to agriculture or the United States would be able to access a picture of the location of farm operations, animal movements and the identities of their owners. Thus, all fields required for premises registration and animal movements need to be protected.

11) How to best minimize burden to develop and maintain records and provide information?

PIIWG feels that the maintenance of on-farm animal movement records is not a burden, as it comprises good business practices. On-farm records provide the most accurate, timely and accessible sources of information.

For the swine industry, it is difficult to understand how reporting all movements would significantly improve a trace-back to the point that it would justify the economic burden. Firstly, the PIIWG feels that for the great majority of the industry, on-farm and market records are complete enough to perform a 48 hour trace-back today. The PIIWG acknowledges that, in theory, having a record of all movements in one place at one time could save some time in the case of a trace-back. However, the PIIWG requests that an analysis be made of the quality of trace-back achievable today versus the extra burden of reporting all movements. Secondly, making submission of data mandatory does not improve its accuracy or timeliness.

The interstate movement system may meet the goal of capturing animal records for modeling and research purposes.

12) Should privately held databases be used for storing animal movement and event records?

For interstate movement reporting, any database, be it private, state or federal will suffice. Any database can serve the goal of a 48 hour trace-back as long as it can meet standards for completeness, accuracy and speed of data recall.

The PIIWG supports the maintenance of animal movement records at the production level. These records may be opened for full inspection and audit upon the request of animal health officials. Some of these will be comprised of paper records; others will be sophisticated computer systems covering large production or market systems. These record keeping systems are already in existence both on farm and in markets and thus are being funded today.

Additional Comments

Program Standards: The PIIWG recommends that the USDA require that a mechanism be put in place to refresh premises registration data on a regular basis, thereby ensuring that data accuracy be maintained.

On page 17, table 14, Program Standards says that USDA APHIS would be responsible for administering GINs. According to the definition of a GIN, on page 7, a GIN is made up of the premises' identification number (PIN) where the group is assembled plus the date that the group was assembled. Thus, there is no need for a producer to have a GIN allocated from a central repository, since this is a unique number that the producer would create himself.

Page 26, Program Standards says that all imported animals need an RFID tag. PIIWG requests that the majority of the original language be re-instated. "All animals arriving into the United States must be identified with an official individual number of the country of origin and/or official tag of the country of origin, and be accompanied by a USDA/APHIS-approved International Certificate of Identification, which shall include a listing of the age and sex of all such animals being imported." PIIWG recommends that the term "RFID" be removed from the original language in order to remain technology neutral. If RFID tags are used on imported animals, they must include the country code of the exporting country to avoid duplication with any US numbers.

Page 32, Program Standards, the definition of "breeding stock" is not clear the way it is written. The PIIWG recommends that breeding stock be defined as "Sexually intact animals of either sex, except for animals moving directly to terminal feedlots or approved market or slaughter establishments".

Page 34, Program Standards, PIIWG proposes that a definition for a terminal feedlot be generated that includes those animals that do not go directly to slaughter, but instead go through other feedlots or marketing channels on their way to slaughter. For example, "A livestock feeding operation where all animals, upon exit of the operation, move directly to other terminal feedlots, approved markets or slaughter establishments."

Page 10, Program Standards, Table 4: In the fields required for premises registration, the PIIWG recommends that under “type” of operation, the subtype of operation should be added. For a swine “type” operation, the subtype could be designated as “commercial”, “transitional” or “feral”. The benefit of this will be that it will significantly improve the ability to perform risk analysis for exposure to diseases harbored by feral animals or wildlife. In the case of swine, these diseases would include Pseudorabies, Classical Swine Fever or Brucellosis. It is recommended that when assigning the operation subtype, that the riskiest subtype of animals housed on the premises define the premises subtype. For instance, if a producer has commercial swine and transitional swine on the same premises, the premises should be designated as “transitional”.

Program Standards: In general, the PIIWG recommends the use of general language such as “approved official identification methods or devices” rather than “ear tags”, “tagged”, “tagging” and “RFID” to allow for flexibility between species and to remain technology neutral.

Program Standards: The use of the term “origin” (page 3) needs to be clarified. PIIWG proposes that the term “birth farm” or “birth premises” be used to define where the animal was born and “source herd” or “source premises” be used to define where an animal was last shipped from.

Program Standards: Page 6 Reference is made to a production system but it is not defined in Appendix A. PIIWG proposes a definition similar to that found in 9 CFR § 71.1. For example “a production enterprise consists of multiple premises of production, but not including slaughter plants or livestock markets that are connected by ownership or contractual relationships, between which animals move while remaining under the control of a single owner or a group of contractually connected owners”.

Program Standards: Page 7. PIIWG proposes that there needs to be a distinction made between group/lot identification and the group/lot identification number (GIN). A GIN will only be required if movements are reported into a database. Group/lot identification will be used for recording purposes. The PIIWG proposes that a definition for group/lot identification be placed into Appendix A. PIIWG proposes that group/lot identification be defined as “the designation of a group of animals maintained by a production system within a static or dynamic group. Production records will document this designation and movement history in a manner which will enable group trace-back.”

Once again, the PIIWG appreciates the opportunity to comment on the NAIS and looks forward to continuing working with USDA on the development of a workable identification program for the pork industry.

Best Wishes,

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